

EXHIBIT 32



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Privacy Statement

Privacy

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Summary

This summary highlights the key points of our Privacy Statement. You can find details on each point by clicking on the links.

- We care about your privacy and have a dedicated data privacy program. We do not and will not sell or rent your data unless this is required in the context of a change in our business structure. Learn more about our approach to data privacy.
- This Statement applies to our Anthology websites as well as to the products and services mentioned in Users of services that we directly provide to individuals. For all other products and services that we provide to educational institutions and other clients, the client's privacy statement governs. Learn more about how we use personal information.
- We share personal information with our affiliates, subsidiaries, and vendors that help provide our products and services. We also share personal information with partners and other third parties in certain circumstances. Learn more about how we share personal information.
- We conduct marketing to promote our products and services. This marketing is aimed at staff of our current and potential clients and partners. We do not use or disclose student information for behavioral targeting of advertisements to students. Learn more about our marketing.
- We do not knowingly collect any personal information from children under the age of 13 without consent. Learn more about how we use children's personal information.
- We employ a variety of physical, technological, and administrative security safeguards designed to protect personal information. Learn more about our security safeguards.
- We may transfer your information to locations outside of your country. Learn more about data transfers and country-specific privacy information.
- On our own websites, we and our partners use cookies and similar technologies ("cookies") to enhance site navigation, analyze site usage, and assist in our marketing efforts (including through targeted advertising on this and other sites). We do not use advertising cookies for our products.
- You can contact us at privacy@anthology.com (<mailto:privacy@anthology.com>) if you want to exercise your privacy rights, have a complaint, or want to ask a question. Learn more about your rights and how you can contact us.

Additional privacy statements are available in our Trust Center (<https://www.anthology.com/trust-center>). For example:

- The Cookie Statement (<https://www.anthology.com/trust-center/cookie-statement>) explains our use of cookies.
- The U.S. State Privacy Notice (<https://www.anthology.com/trust-center/us-state-privacy-notice>) supplements this Privacy Statement and provides additional disclosures for U.S. residents of the states of California, Colorado, Connecticut, Nevada, Virginia and Utah who our products and services when we are acting as a business.
- The Spanish version of the Privacy Statement (<https://www.anthology.com/trust-center/declaraci%C3%B3n-de-privacidad>) includes specific information regarding personal information that is processed in Colombia.

This Statement was last updated on August 4, 2023 – What's New? (<https://www.anthology.com/trust-center/whats-new>)

Introduction

We care about privacy. We believe that privacy is a fundamental right for all individuals. Our clients entrust us with the personal information of their employees and their users, who are often students. We take the obligations that are attached to this information very seriously. We therefore have a dedicated data privacy program with privacy by design at its heart. You can learn more about our data privacy program by visiting our Trust Center (<https://www.anthology.com/trust-center>).

Our business model is different from that of companies that collect your personal information to monetize such data. We collect and use personal information to allow us to provide our products and services to our clients and end users. In most cases, we do this at the direction of our clients. We do not and will not sell or rent your data to third parties unless this is required in the context of changes to our business structure such as a merger or acquisition. See Vendors, partners & other types of disclosures for more details on how we may disclose personal information in the context of changes to our business structure.

We are a proud signatory of the Privacy Pledge 2020, and a member of the Future of Privacy Forum.



uses cookies to enhance user experience and to analyze performance and traffic on our website. We also
 tion about your use of our site, including for marketing, advertising and analytics partners. [Cookie](https://www.anthology.com/trust-center/cookie-statement)
<https://www.anthology.com/trust-center/cookie-statement>)



This privacy statement applies to the personal information we collect about you through our Anthology websites. It also applies to our client marketing and engagement activities such as contacting the relevant staff or clients by email, mail, or by telephone.

This privacy statement does not apply if you are a user of an institution (e.g., a school, college, or university) and we are providing our products and services to you on the institution's behalf. In this case, we are considered a processor and your institution's privacy statement governs the use of personal information.

This Statement applies to all our services that we provide directly to you. Whether you are browsing our websites, receive our newsletters, or use an online trial version of our products, this Statement applies to the use of personal information for all our products and services that we provide directly to you as a so-called 'data controller.'

When your institution's privacy statement/policy applies. If you are an end-user of our client and we are providing our products and services to you on our client's (your institution's) behalf, we are considered a 'data processor.' In this case, our Statement does not apply. Rather, your institution's privacy statement applies. Our Privacy Statement also does not affect the terms of any agreements between us and your institution (or any other client or third party), nor does it affect the terms of any agreement between you and your institution.

Who we are. When we refer to "us", "we", "our", or "**Anthology**" in this Statement, we mean Anthology Inc. and its subsidiaries and affiliates. For our processing as a controller in Colombia, the controlling entity is Consultora Nivel 7 S.A.S.

Changes to this Statement. From time to time we will need to update this Statement to reflect changes to our products and services, the way we operate, or to meet new legal and regulatory requirements. You will find the latest version of this Statement at www.anthology.com/trust-center/privacy-statement (<https://www.anthology.com/trust-center/privacy-statement>). We will explain changes to this Statement on the What's New? (<https://www.anthology.com/trust-center/whats-new>) page.

How we use your information depends on your relationship with us

What types of personal information we collect and how we use it will depend on your relationship with us. The other sections in our Statement apply to all our activities.

Website users

This section only applies to the use of personal information related to our own websites (e.g., [anthology.com](https://www.anthology.com/) (<https://www.anthology.com/>)). It does not apply to any products and websites we provide on behalf of our clients. Please visit End user of an institution that uses our products for information on how we use personal information of our clients' end users.

Anthology has various websites for different services and geographies that are accessible to anyone. You generally can visit our websites without having to log in or otherwise identify yourself. On some of our websites, you may need to log in to benefit from the service or to make use of all the functionalities and be able to communicate with us or other Anthology users, such as with our Community website and our client support portals.

Information we collect

- **Directly from you.** Some of our websites require you to sign up for an account. When you do, we ask you for information, such as your name and email address, that we need to set up your account. Often you can also voluntarily provide additional information, such as a photo or biographical information, to make better use of our websites. We also collect information you provide by registering for events, completing forms or surveys on our websites, or giving us your business card. If you provide additional content through user forums, for example, when you communicate with others on our Community site, we may link this information with your personal information if you are logged in.
- **Indirectly from you.** We collect information about the pages you visit and how you access and use our websites using cookies and third-party analytics tools. This information includes information about the device(s) you use to access the websites including unique device identifiers, IP address, operating system, browser, and cookies. Depending on your device settings, we may also collect information about your geographical location. Learn more about our use of cookies in our Cookie Statement (<https://www.anthology.com/trust-center/cookie-statement>) and traffic on our website. We also share information about your use of our site with our social media, advertising and analytics partners. **Cookie**
- **Information from third parties.** We receive information from affiliates in our Anthology group of companies, our partners, and other third parties that we use to enhance the website experience and promote our products and services. For example, we will receive information from some third parties about how well an online marketing or email campaign performed.

How we use this information

We use this information to provide and improve our website services as follows.

Analytics and marketing. We analyze usage information for sales and marketing purposes and for trends about our visitors and their demographics and how they use our websites. This analysis is necessary to further our legitimate interest in understanding our users and how they interact with us and our websites, improving our websites, and communication with you (including for marketing purposes). Learn more about how we use personal information for client engagement and marketing.

Personalization. For some of our websites we also use your information to personalize the pages, which is necessary to provide more contextually relevant information as you browse our websites. For example, if you have indicated your primary industry or your job title, we may present content related to your role or industry as you browse our websites and return to them.

Communication. If you use websites with logins, we use the contact details you provided to communicate with you and to let you communicate with us and other Anthology users. Typically, we use information in this way because it is required to provide this service to you and because it is in our legitimate interests to ensure our services are being offered in a manner that meets our high standards.

We keep website usage information for as long as it is necessary for the purposes described above. This period of time will vary depending on the services and websites you use and how you interact with us. Account information is kept until you delete the account and for a limited period afterwards. Where you provide information in forms, the information is kept only as long as required. For example, we may need to keep a record of the correspondence with you if you have made a complaint for as long as it is necessary to protect us from any legal claim. Similarly, if you unsubscribe from receiving marketing communications from us, we will keep a record of this to ensure you do not receive such communications in the future.

Who we share this information with

Third-party tools. Where we use third-party tools (for example to understand how our websites are used and make sure you see relevant ads and campaigns on other websites), these third parties will have access to some of your personal information. This includes analytics tools such as Google Analytics and advertising tools such as Facebook Business.

Learn more about interest-based advertising and about our use of cookies in our Cookie Statement (<https://www.anthology.com/trust-center/cookie-statement>).

Partners. We share personal information related to staff of our existing or prospective clients with resellers of our products and services and other partners, who may use such information for marketing. We do not share any personal information that we use on behalf of our clients (e.g., Student Data) except as instructed by our clients. Learn more about sharing with partners.

Vendors. We also share information with our vendors and service providers and other third parties for legal or business purposes. Learn more about how we ensure your information is protected by our vendors.

End user of an institution that uses our products

Your institution decides how your personal information is used. We provide most of our products and services to end-users of an institution as a so-called 'data processor' on behalf of our clients (for example, school, districts, universities, and corporations). This means that the main responsibility for data privacy compliance lies with your institution as the 'data controller.' It also means that your institution's privacy statement applies to the use of your personal information (instead of ours). Your institution determines what information we collect through our products and services and how it is used, and we process your information according to your institution's instructions and the terms of our contracts with your institution.

Read your institution's privacy statement. The following section is for informational purposes and describes how your information is generally used when we provide products and services to you on behalf of a client. How your information is used depends on your institution, so you should read your institution's privacy statement.

For our Web Community Manager product, please read the separate Web Community Manager Privacy Policy (<https://www.blackboard.com/blackboard-web-community-manager-privacy-statement>).

This website uses cookies to enhance user experience and to analyze performance and traffic on our website. We also share information about your use of our site with our social media, advertising and analytics partners. [Cookie](#)

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- **Information your institution provides to us.** Typically, our products and services integrate with your institution's systems. As such, your institution will provide us with information about you to set up and maintain your account or for us to be able to provide the product or service. This includes information in the following data categories:
 - *Account information:* The exact data elements will depend on the product, but often we receive your name, email address, student ID, account credentials, and courses you are enrolled in when we initially set up the products and services for your institution. We

will receive regular updated information to keep your account information accurate and up to date.

- **Additional contact details:** For some products, we also receive your phone number to send you text (SMS) notifications.
- **Application, admission, visa, enrollment, and financial aid information:** If your institution uses our student information system, admissions, enrollment helpdesk, financial aid support and similar products and services, your institution will make this type of information available to us to provide these services.
- **Payroll information:** If we provide Anthology Payroll to your institution, we will receive payroll related information such as salary, tax, and benefit information from your institution.
- **Directly from you.** Depending on the products and services you use, we will collect the following data categories directly from you:
 - **Profile information:** We collect your first and last name, email address, and similar contact data when you provide or update this information in our products. In many products and services, you can choose to provide more information for your account profile, such as your photograph and other biographical content, which may be shared with others through the products and services. In some products, you can choose to provide your phone number to receive notifications via text (SMS). In some of our products, such as our Blackboard Learn Mobile App, you can also give us permission to access your contact list on your mobile device. This allows us to match your contacts to users in Learn and display their photo from the users contact list in discussion boards.
 - **Credentials:** Our products and services often integrate with your institution's systems and rely on the credentials your institution uses. Where this is not the case, we will collect passwords, password hints, and similar security information that we use for authentication and account access.
 - **Content and activity:** We collect data about your responses to quizzes, your assignments and other course work, and files you submit or upload as well as your activity and actions within our products and services. In some products, you can also provide comments in discussion forums and chats and send messages to your peers and instructors. If you are an instructor, we also collect information about your grading, feedback and assessments, and similar actions within our products.
 - **Audio and video recordings.** Some of our products allow you (as a student or instructor) to submit audio and video feedback, and we collect the related information, including metadata.
 - **Financial information.** If we provide financial aid support on behalf of your institution, we will collect financial information that is required to help you with the related applications.
 - **Payment data.** For some of our products and services, we collect data necessary to process your payments, including your credit card number and the security code associated with your credit card. We maintain the applicable Payment Card Industry (PCI) compliance levels for such data.
 - **Support.** When you or your institution contacts us for support, we may collect limited information about you that you or a representative of your institution provides to us. We use this information only to assist with client support cases on behalf of your institution. When you contact us, your phone conversations or chat sessions with our client support teams may be monitored and recorded for training and quality purposes. Some of our products and services such as the Blackboard Learn Mobile App also have feedback functionality that collects limited information about your device, the product, and your institution such as your user ID or school ID when you provide feedback.
- **Indirectly from you.** We collect information on how you use our products and services. Depending on which product or service you use, this may include the following data categories:
 - **Chat and audio recordings.** Some of our products allow for virtual classroom sessions to be recorded. There is an indicator if the session is being recorded.
 - **Location and events data.** For some of our products and services, we will collect information about classes and events you have visited and attended on behalf of your institution, as well as the time and date of such visits. Additionally, we may collect precise geolocation data when you use the mobile apps for some of our products. You will be asked if you want to enable location data before we collect such information from your device.
 - **Notifications.** Our Mass Notification and Connect products will collect information on how you react to our notifications. For instance, we record if you listened to our phone call, if we left a voice message, or if the phone call was unanswered.
 - **Device and usage.** We collect device and usage information when you access and use our products and services, including information that your browser or the mobile app sends when you are using it. This data may include your unique device identifier, Internet Protocol address, your browser type and configuration, the date and time of your use of the product or service, language preferences, and session data. Learn more about our use of cookies in our Cookie Statement (<https://www.anthology.com/trust-center/cookie-statement>).
- **Information from third parties.**
 - **Affiliates, vendors and integrations.** We may receive information from affiliates in our Anthology group of companies, our partners, and other third parties. For example, we may receive personal information from our other products or from third-party services

This website uses cookies to enhance user experience and to analyze performance and traffic on our website. We also share information about your use of our website with our analytics providers. You can control how we use cookies by adjusting your browser settings. For more information, please see our Cookie Statement (<https://www.anthology.com/trust-center/cookie-statement>).

that integrate or complement our products to ensure a seamless experience. Some of our products (e.g., Anthology Student) are built on Microsoft Azure and will exchange information with our clients' Microsoft Azure environment.

- **Information from social media sites.** When you interact with our products and services through social media services, such as when you log in through Facebook, use Cloud/Social Profile, or share Anthology content on Facebook, Twitter, or LinkedIn, we may receive information from these social media companies. For instance, when you log in to a service using a social media account, the social media company will authenticate your identity and provide you the option to share certain personal information from your social media profile with us, which could include your name, email address, age, gender, position, and profile picture. If your institution has enabled Cloud Profiles or Social Profiles, you can also connect your Anthology profile with your Facebook and Twitter account and use information from those accounts for your Anthology profile. The data we receive is dependent upon the social media service and your privacy settings with the social media service.
- **Social media posts.** Our Social Media Manager product allows institutions to collect public social media posts and comments with matching keywords and hashtags to give an institution visibility into social conversations taking place about them. Social Media Manager will retain this information for the institution even if the original content was deleted.

How we use this information

On behalf of your institution. We use your information on behalf of and under the instruction of your institution, which is the data controller. We use the information in accordance with our agreement with your institution to operate, maintain, and provide the features and functionality of the products and services. Your institution determines how your information is used.

Analytics and Recommendations. Providing our products and services to your institution may include analytics functionalities. Among other things, such functionalities can indicate your performance compared to that of your peers, project your future performance, and provide this information to instructors and other staff of your institution. Some of our products and services will also provide recommendations or suggest actions to your instructors / staff or directly to you based on the available data, so that your institution can support you.

Please read your institution's privacy statement for more details on how your institution uses your personal information.

Product enhancement and research. Where the agreement with your institutions gives us the permission, we may also use:

- Your personal information to evaluate and improve our products and services and develop new products and services
- De-identified information for other purposes such as carrying out research and analyzing trends

When we use information for these purposes, we will implement appropriate safeguards. This may include removing or hashing direct identifiers (e.g., your name, email address, and device ID) from the data set before carrying out research and analysis.

Who we share this information with

We share your information in accordance with our agreement with your institution. Generally, this includes the sharing of data within and outside of Anthology.

- **Within Anthology.** Your information will be accessed only by those who have a need to know to provide the products and services to your institution and improve them. For instance, our technical teams and client support teams may have access to your information when we set up the product for your institution or when software or database changes are required for support and maintenance purposes.
- **With your institution.** Much of the personal information we collect and use about you is shared with your institution that uses our products and services and with other institutional users. What information is shared depends on the product functionality, settings, and instructions of your institution. Please read your institution's privacy statement to learn more.
- **Outside Anthology.** We use vendors to help us provide our products and services to you on behalf of your institution. For example, Amazon Web Services, and Microsoft help us host our products and services. Our products and services may also integrate with third party products of your institution and exchange personal information to enable a seamless and secure integration. Where we use third party tools (for example, to understand how our products and services are used), these third parties will have access to some of your personal information. We use Google Analytics and other analytics tools to help us measure traffic and usage trends to help us analyze and improve the performance of our websites. Learn more about Google Analytics in our Cookie Statement (<https://www.anthology.com/trust-center/cookie-statement>).

Your institution may ask us to share such information with additional parties or it may share your information further. Please read your institution's privacy statement.

Users of services that we directly provide to individuals (e.g., DTLs for individuals, Blackboard Assist for end users)

If you are using one of our services that we provide directly to individuals (rather than your institution) such as the Digital Teaching and Learning Services (DTLs for Individuals) and Blackboard Assist for end users, we are providing these products and services directly to you as the 'data controller'. In these instances, we are directly responsible for data privacy compliance and this Privacy Statement applies to how your information is used.

This section does not apply to personal information about end users of our clients (including Student Data), please visit End user of an institution that user our products for the relevant information.

Information we collect

- **Directly from you.** Depending on the products and services you use, we will collect the following data categories directly from you:
 - *Profile information:* We collect your first and last name, email address, and similar contact data when you provide and update this data in our products. In many products and services, you can choose to provide more information for your account profile, such as your photograph and other biographical content, which may be shared with others through the products and services. In some products you can choose to provide your phone number to receive notifications via text (SMS).
 - *Credentials:* We collect passwords, password hints, and similar security information that we use for authentication and account access.
 - *Content and activity:* We collect data about your responses to quizzes, your assignments and other course work, and files you submit or upload as well as your activity and actions within our products and services. In some products you also can provide comments in discussion forums and chats and can send messages to your peers and instructors. If you are an instructor, we also collect information about your grading, feedback and assessments, and similar actions within our products. If you use Blackboard Assist for end users, we will also collect data regarding the type of services you use and the frequency with which you use these services.
 - *Audio and video recordings:* Some of our products allow you (as a student or instructor) to submit audio and video feedback, and we collect the related information, including metadata.
 - *Support:* When you contact us for support, we may collect limited information about you that you provide to us. We use this information only to assist with client support cases. When you contact us, your phone conversations or chat sessions with our client support teams may be monitored and recorded for training and quality purposes.
 - **Indirectly from you.** We collect information on how you use our products and services. Depending on which product or service you use, this may include the following data categories:
 - *Chat and audio recordings:* Some of our products allow for virtual classroom sessions to be recorded. There is an indicator if the session is being recorded.
 - *Device and usage:* We collect device and usage information when you access and use our products and services, including information that your browser or the mobile app sends when you are using it. This data may include your unique device identifier, Internet Protocol address, your browser type and configuration, the date and time of your use of the product or service, language preferences, and cookie data. Learn more about our use of cookies in our Cookie Statement (<https://www.anthology.com/trust-center/cookie-statement>).
 - **Information from third parties.**
 - *Affiliates and vendors.* We may receive information from affiliates in our Anthology group of companies, our partners, and other third parties. For example, we may receive limited personal information from our other products or from third-party services that integrate or complement our products to ensure a seamless experience. If you use Blackboard Assist, we may receive information from our partners that will allow us to notify you directly within Assist of any new information regarding the partners services that you subscribed to.
- This website uses cookies to enhance user experience and to analyze performance and usage on our website. We also share information about your use of our site with our social media, advertising and analytics partners. [Cookie Statement \(https://www.anthology.com/trust-center/cookie-statement\)](https://www.anthology.com/trust-center/cookie-statement)
- *Information from social media sites.* When you interact with our products and services through social media services, such as when you log in through Facebook, or share Anthology content on Facebook, Twitter, or LinkedIn, we may receive information from these social media companies. For instance, when you log in to a service using a social media account, the social media company will authenticate your identity and provide you the option to share certain personal information from your social media profile with us, which could include your name, email address, age, gender, position, and profile picture. The data we receive is dependent upon the social media service and your privacy settings with the social media service.

- **Information from other third parties.** If you use Digital Teaching and Learning Services (DTLS B2C), we will also receive limited information back from the payment gateway provider (e.g., PayPal) regarding the payment status.

How we use this information

To provide features and functionality. We use your information to operate, maintain, and provide to you the features and functionality of our products and services, as well as to communicate directly with you (for example, to send you email messages and push notifications) to allow you to communicate with others in the product and service and to allow you to take full advantage of products and services provided by us and by selected partners that will guide you through your academic journey. Typically, it will be necessary for us to use your information in this way in order to provide you with the service you request or because it is in our legitimate interests to ensure our products and services are being offered in a manner that meets our high standards.

Improve our products. We use de-identified information to understand and improve our products and services. We carry out research and analyze trends typically because it is in our legitimate interests to better understand how users are using our products and services, how we can further improve them and how useful the products and services provided by us and our selected partners are. When we use information for these purposes, we will implement appropriate safeguards. This may include removing or hashing direct identifiers (e.g., your name, email address, and device ID) from the data set before carrying out research and analysis.

Marketing. When you use our trial versions, we may use your information for marketing purposes. If you use products and services that we provide directly to you as an end user, such as Blackboard Assist for end users, we may use your information for behavioral targeting of advertising, as stated in the Marketing Section. Learn more about marketing.

Who we share this information with

We share this information to provide the products and services to you and further improve them.

- **Within Anthology.** Your information will be accessed only by those who have a need to know to provide the products and services. For instance, our technical teams and client support teams may have access to your information when software or database changes are required for support and maintenance purposes.
- **Outside Anthology.** We use vendors to help us provide our products and services to you. For example, Amazon Web Services help us host our products and services. For Digital Teaching and Learning (DTLS B2C), we disclose information to your selected payment gateway (e.g., PayPal) that is required for the payment process. For Digital Teaching and Learning (DTLS for Individuals), we may also disclose information to our partners who are delivering the course, for the sole purpose of ensuring the correct delivery of the courses. Where we use third-party tools (for example, to understand how our products and services are used), these third parties will have access to some of your personal information. This includes analytics tools such as Google Analytics (Learn more about Google Analytics and how we may share information for marketing purposes). As necessary for managing the partnerships, we may also provide deidentified information to our partners relating to the usage of products and services provided by our partners.

Vendors, partners & other types of disclosures

This section provides more information on how we protect your information when we engage vendors, how we share information with our partners, and in which other scenarios we may share your information with third parties.

Vendors

We use vendors to help us provide our products and services to our clients and you or to perform work on our behalf. Where this requires access to personal information, we are responsible for the data privacy practices of the vendors. Our vendors must abide by our strict data privacy and security requirements and instructions. They are not allowed to use personal information they access or receive from us for any other purposes than as needed to carry out their work for us.

Partners

In some countries and regions, our products and services are offered through channel (or reselling) partners (see the list of our channel partners (<https://www.anthology.com/channel-partnerships>)). We will share information with them that is necessary for them to offer and provide our products and services to our current and prospective clients.

Some of our products allow you to access functionalities or content provided by our content and technology partners. For example, Blackboard Learn's integration with YouTube through the YouTube API Services allows institutions to incorporate YouTube functionalities directly in the course environment in Learn (Learn more about how Google/YouTube uses the related personal

information in the Google Privacy Policy (<https://policies.google.com/privacy?hl=en-US> target=)). With your or your institution's permission, we will share information about you, such as your name, email, or student ID, that is required for you to access these partner functionalities or content from our products and services.

Other types of disclosures

We will also share your information where required in the following circumstances.

- **Payments.** Where you use our products and services to make a purchase or transaction, we will share your payment and transaction data with banks and other organizations to process the transactions and for fraud detection and prevention or anti-money laundering purposes.
- **Changes to our business structure.** Where permitted by applicable law and by the contracts with our clients, we may disclose your information in the following cases. We will always aim to continue to apply commitments we make in this Statement in such a case. If this is not possible, we will notify our clients and we will not provide personal information about end users of our clients (including Student Data) without the required agreement of our clients, to a successor entity in the situations described below:
 - Corporate transactions such as merger, acquisition, sale of assets, and financing
 - Bankruptcy, dissolution or reorganization, or in similar transactions or proceedings
 - Steps related to the previous bullet points (for example, due diligence)
- **Comply with law.** We may need to disclose your information to comply with legal or regulatory requirements and to respond to lawful requests, court orders, and legal processes. We will always aim to limit the information we provide as much as possible. Where such disclosures relate to personal information we hold on behalf of our clients, we will defer such requests to our clients where permissible.
- **Enforce our rights, prevent fraud, and for safety.** We may need to disclose your information to protect and defend the rights, property, or safety of us, our clients, or third parties, including enforcing contracts or policies or in connection with investigating and preventing fraud.
- **De-identified information.** We may disclose aggregate or de-identified information that is no longer associated with an identifiable individual for research or to enhance and promote our products and services. For example, we may share aggregated or de-identified information with our partners or others for business or research purposes, like partnering with a research firm or academics to explore how our products are being used and how such data can be used to enhance our functionalities and further help our clients and other educational institutions. We will implement appropriate safeguards before sharing information, which may include removing or hashing direct identifiers (e.g., your name, email address, and device ID).

Client engagement & marketing

Client engagement

Managing the client relationship. We are collecting and storing limited personal information about the relevant contacts at our clients for invoicing, notification of product updates and maintenance, and similar purposes.

Marketing

No behavioral advertising to students in our products and services. We do not use or disclose information (whether personal information or otherwise) about students that we collect through the educational products and services we provide on behalf of educational institutions for behavioral targeting of advertisements to students. We may place contextual advertising where permitted by our agreement with your institution.

Promotion of products and services. We conduct marketing to promote our products and services. This marketing is generally aimed at staff of our current and potential clients and partners. However, we do not restrict activities and events to those audiences when such activities and events benefit instructors and other end users of systems, such as webinars that explain how our products can be used effectively.

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Events and webinars. When we conduct or sponsor events and webinars, we will collect information about attendees, such as the session they attend and their contact details, to provide them with relevant product information and other Anthology-related information.

Sharing within Anthology. We may share personal information related to marketing with the relevant Anthology affiliates and departments. For example, information from a local Sales team may be provided to the global Field Marketing and Marketing Operations teams to update the relevant systems and send product and other promotional communications to you.

Sharing with partners. In some countries and regions, our products and services are offered through channel (or reselling) partners (see the list of our channel partners (<https://www.anthology.com/channel-partnerships>)). We will share the information that is necessary for our partners to promote our products and services to their clients and potential clients. We also work with technology and integration partners (see the list of our technology and integration partners (<https://www.anthology.com/integration-partnerships>)) with whom we may share information such as event attendance if we have permission to do so.

Sharing with vendors. We may use vendors to help us organize and conduct campaigns, events, and other aspects of marketing. We will share with them only the personal information that is necessary and ensure that they are following our strict requirements for vendors (learn more about sharing with vendors).

Marketing preferences and opt-out. Our marketing emails will include a link so that you can change your preferences and opt-out of receiving marketing communications from us. You can do this by clicking on the "Unsubscribe" link in the email footer which will direct you to our Marketing Preference Center. While it doesn't give you the same detailed controls as our Marketing Preference Center, you can also send us an email at unsubscribe@anthology.com (<mailto:unsubscribe@anthology.com>) to unsubscribe.

Online and interest-based advertising on our websites. At times, we use third party advertising tools to collect information about your visits to our websites to serve you targeted advertisements based on your browsing history and interests on other websites and online services or on other devices you may use. We only use these tools on our own websites (e.g., [anthology.com](https://www.anthology.com)) and not for websites or products that we provide on behalf of our clients. When we are providing our services on behalf of a client, our products and services do not use interest-based advertising tools except as instructed by our clients.

In some instances, we may share a common account identifier related to your use of our websites (such as an email address or user ID) with our third-party advertising partners to help identify and contact you across devices. We and our third-party partners use this information to make the advertisements you see online more relevant to your interests, as well as to provide advertising-related services such as reporting, attribution, analytics, and market research.

You can accept, opt out, and set your preferences for cookies used for online advertising by using the cookie options that are available in our cookie banner on our websites. To learn more about interest-based advertising and how you may be able to opt-out of some of this advertising, you can visit the Network Advertising Initiative's online resources, at www.networkadvertising.org/choices (<http://www.networkadvertising.org/choices>), the DAA's resources at www.aboutads.info/choices (<http://www.aboutads.info/choices>) and/or Your Online Choices at www.youronlinechoices.com/uk (<http://www.youronlinechoices.com/uk>). Please note:

- These tools will only opt you out from receiving interest-based ads on that specific browser or device, but you may still receive interest-based ads on your other devices. You must perform the opt-out on each browser or device you use.
- Some of these opt-outs may not be effective unless your browser is set to accept cookies. If you delete cookies, change your browser settings, switch browsers or computers, or use another operating system, you will need to opt-out again.

Google Analytics and Advertising on our websites. We may also utilize certain forms of display advertising and other advanced features through Google Analytics, such as Remarketing with Google Analytics, Google Display Network Impression Reporting, the DoubleClick Campaign Manager Integration, and Google Analytics Demographics and Interest Reporting on our own websites. These features enable us to use first-party cookies (such as the Google Analytics cookie) and third-party cookies (such as the DoubleClick advertising cookie) or other third-party cookies together to inform, optimize, and display ads based on your past visits to our websites. You can accept, opt out and set your preferences for cookies used for online advertising by using the cookie options that are available in the cookie banner on our websites. For information on how Google Analytics collects and processes data, as well as how you can control information sent to Google, review Google's site "How Google uses data when you use our partners' sites or apps" (<https://policies.google.com/technologies/partner-sites>). You may control your advertising preferences or opt-out of certain Google advertising products by visiting the Google Ads Preferences Manager, currently available at google.com/ads/preferences (<https://google.com/ads/preferences>) or by visiting NAI's online resources at www.networkadvertising.org/choices (<http://www.networkadvertising.org/choices>).

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Children's privacy (COPPA)

We do not knowingly collect any information from children under the age of 13 in the United States unless and until the relevant institution has provided consent and authorization for a student under 13 to use the products and services and for us to collect information from such student. Where a client institution instructs us to collect personal information from children under the age of 13,

we collect, use, process and retain such information solely to provide the educational services on behalf of the client and for the purposes set forth in our agreement with the client. We collect only as much information as is necessary to provide the service and the client may access, delete, or withdraw consent for continued processing of the child's information at any time. If you have any questions about reviewing, modifying, or deleting personal information of a child under the age of 13, please contact your educational institution directly.

Please contact us at privacy@anthology.com (mailto:privacy@anthology.com) if you believe we have inadvertently collected personal information from a child under 13 without proper consent. This will allow us to delete such information as soon as possible.

Security

We take your privacy seriously and are committed to maintaining the privacy and security of the personal information you provide to us. We employ a variety of physical, administrative, and technological safeguards designed to protect personal information against loss, misuse, and unauthorized access or disclosure. We have a dedicated information security program and work hard to continuously enhance our technical and operational security measures.

Our measures consider the sensitivity of the information we collect, use, and store, and the current state of technology. Our security measures include data encryption at rest and in transit, firewalls, data use, and access limitations for our personnel and vendors and physical access controls to our facilities.

All products and services that use payment data maintain the applicable Payment Card Industry (PCI) compliance levels. Our compliance with the PCI standards is validated during annual audits that are conducted by external auditors (so-called 'Qualified Security Assessors').

Data transfers & additional regional and country information

Data transfers

Anthology is a global company headquartered in the United States. For many of our products, we use a regional hosting strategy, but we may need to access your information from locations outside of your region and country, including from the United States and the Netherlands, for support and maintenance purposes where permitted under applicable law and our contract with your institution. We understand the importance of complying with data transfer requirements. We use approved data transfer mechanisms, such as the standard contractual clauses approved by the EU Commission ("SCCs") to ensure the adequate protection of your information when it is transferred. Learn more about our approach to data transfer compliance in our Trust Center (<https://www.anthology.com/trust-center>).

United States – FERPA and state education privacy laws

We provide educational products and services to schools and other educational institutions. Through the provision of these products and services, we collect personally identifiable information from or about students ("Student Data"), which may include educational records governed by the Family Educational Rights and Privacy Act (FERPA). We consider such Student Data to be strictly confidential and in general do not use such data for any purpose other than improving and providing our products and services to the educational institution or on the educational institution's behalf. Our collection, use, and sharing of Student Data is governed by our contracts with the educational institutions, the provisions of FERPA, the Children's Online Privacy Protection Act ("COPPA"), and other applicable laws that relate to the collection and use of personal information of students, but not by the provisions contained in this Privacy Statement. If you have any questions about reviewing, modifying, or deleting personal information of a student, please contact your educational institution directly.

Your rights

In many jurisdictions, you have rights under applicable data protection laws to control how your personal information is used. You may have the right to request access to, rectification of, or erasure of personal information we hold about you. You also may have the right to object to, or restrict, certain types of use of your personal information and request a machine-readable copy of the personal information you have provided to us. This website uses cookies to enhance user experience and to analyze performance and traffic on our website. We also use cookies to personalize content and advertising. You can manage your cookie preferences in our Trust Center.

Statement (<https://www.anthology.com/trust-center/cookie-statement>)

In many of our products, you will be able to access your information as well as change and delete some of the information yourself by logging into your account. If you cannot access, correct, or delete the required information yourself, please follow these steps:

- If you are a user of our products and services that we provide on behalf of your institution, **contact your institution** to exercise your rights. They need to manage your request even if it relates to information that we store on behalf of your institution. We will support

your institution with your request.

- In all other cases, email us at privacy@anthology.com (<mailto:privacy@anthology.com>) or contact us using the address below if you want to exercise any of these rights.

Please remember that many of these rights are not absolute. In some circumstances, we (or your institution) are not legally required to comply with your request because of relevant legal exemptions.

In many jurisdictions, you also have the right to lodge a complaint with the local data protection authority. But please contact us first, so we can address your concern.

Colombia

In addition to the rights mentioned above, for personal information being processed in Colombia, individuals will also have the right to: (i) request a copy of their consent as the lawful basis for the processing of the personal information, (ii) withdraw their consent for processing of the personal information; and (iii) ask us, as controllers or processors, about the purpose and use cases for processing their personal information. If you want to exercise any of your rights regarding the personal information that we process in Colombia, please visit our Colombia Privacy Rights Process (<https://www.anthology.com/trust-center/colombia-privacy-rights-process>) page for more information.

United States

If you are a resident of the states of California, Colorado, Connecticut, Nevada, Virginia or Utah, you may have additional rights in relation to your Personal Information. Please visit our U.S. State Privacy Notice (<https://www.anthology.com/trust-center/us-state-privacy-notice>) for more information on how to exercise these rights.

Contact us

End users of institutions and technical issues: If you are a user of our products and services we provide on behalf of your institution, contact your institution first as your institution's privacy statement and data privacy practices will determine how Anthology uses personal information on your institution's behalf. If you have a technical or support issue, please contact the helpdesk of your institution. They will be able to assist.

If you have any questions or concerns about our Privacy Statement or our own data privacy practices, contact us at privacy@anthology.com (<mailto:privacy@anthology.com>) or write to us at the following address.

Global Privacy Officer

Legal Department
Anthology Inc.
11720 Plaza America Drive
11th Floor
Reston, Virginia 20190



(<https://www.anthology.com/>)

Anthology supports learners and institutions with the largest EdTech ecosystem on a global scale.

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Modern Slavery Act Statement

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